

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2012-136-C

IN RE:

Office of Regulatory Staff Petition to
Review FCC Mandated Reductions to
Intrastate Access Tariffs

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PETITION TO INTERVENE

Petitioner Competitive Carriers of the South¹ Inc. (“CompSouth”) or (“Petitioner”), by its undersigned attorneys, hereby petition the South Carolina Public Service Commission (the “Commission”), pursuant to Rule 103-825 of the Commission’s Rules, for an order allowing CompSouth to intervene in the above referenced Docket, with full rights to participate as a party of record. In support of its petition, CompSouth would show the Commission the following:

I. BACKGROUND

1. CompSouth is a trade association whose members are telecommunications service providers authorized to provide telecommunications services in various states through the southern United States, including the state of South Carolina.

2. On March 29, 2012, the Office of Regulatory Staff (“ORS”) filed a petition requesting

¹ CompSouth members include Access Point Inc., Birch Communications, Inc., Cbeyond Communications LLC., Covad Communications Company, EarthLink Business, Level 3 Communications, tw telecom inc., and XO Communications Services, Inc.

that the Commission order all local exchange carriers affected by the ICC Reform Order to file appropriate tariff revisions on or before June 1, 2012, which would provide the ORS, the Commission, and others the opportunity to review the proposed tariff filings prior to the July 1, 2012 deadline established by the FCC.

3. The ORS requested in its petition that the Commission establish a proceeding and a deadline of June 1, 2012 for the requisite tariff filings, including Supporting Documentation, in order to comply with the requirements of the ICC Reform Order.

4. CompSouth has an interest in this proceeding because its members will be affected by the implementation of the ICC Reform Order, and its position in this Docket is that the ICC Reform Order be implemented fully. Accordingly, CompSouth incorporates by reference its Petition filed concomitantly with this Petition to Intervene.

5. Petitioner should therefore be permitted to intervene in this proceeding in order to protect the interests of its members, and to be allowed to participate fully and present testimony and other evidence as appropriate.

6. Petitioner's authorized representative in this proceeding is:

John J. Pringle, Jr., Esquire
Ellis, Lawhorne & Sims, P.A.
1501 Main Street, Suite 500
P.O. Box 2285
Columbia, SC 29202
(803) 343-1270
jpringle@ellislawhorne.com

7. CompSouth asserts that the granting of its Petition to Intervene will not in any way delay the proceedings in this Docket.

WHEREFORE, CompSouth prays for the Commission to:

- a. Grant this Petition to Intervene and make Petitioners a party of record in Docket No. 2012-136-C, allowing Petitioners to participate fully and take such positions as it deems advisable; and
- b. Grant such other relief as the Commission deems just and proper.

Respectfully submitted,

ELLIS, LAWHORNE & SIMS, P.A.

BY: s / John J. Pringle, Jr.
John J. Pringle, Jr., Esquire
Post Office Box 2285
Columbia, SC 29202
(803) 343-1270
jpringle@ellislawhorne.com
Attorneys for tw telecom of south carolina, lp
and the Competitive Carriers of the South, Inc.

May 2, 2012
Columbia, South Carolina

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CERTIFICATE OF SERVICE

This is to certify that I have caused to be served this day, the **Petition to Intervene** filed by Competitive Carriers of the South, Inc. by placing a copy of same in the care and custody of the United States Postal Service (unless otherwise specified), with proper first-class postage affixed hereto and addressed as follows:

VIA FIRST CLASS AND ELECTRONIC MAIL SERVICE

Nanette S. Edwards, Esq.
Office of Regulatory Staff
1401 Main Street, Suite 900
Columbia, SC, 29201
nsedwar@regstaff.sc.gov

VIA FIRST CLASS AND ELECTRONIC MAIL SERVICE

Frank Rogers Ellerbe, III, Esq.
Bonnie D. Shealy, Esq.
Robinson McFadden & Moore, PC
PO Box 944
Columbia SC 29202
bshealy@robinsonlaw.com
fellerbe@robinsonlaw.com

s/ Carol Roof
Carol Roof
Paralegal

May 2, 2012
Columbia, South Carolina